

**IN THE CHANCERY COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

FOREST CREEK TOWNHOMES, LLC)	
)	
Plaintiff,)	
)	
v.)	No. CH-14-1553-3
)	JURY DEMANDED
CARROLL PROPERTY MANAGEMENT,)	
LLC; and HEDIGER ENTERPRISES,)	
INC.,)	
)	
)	
)	
Defendants.)	

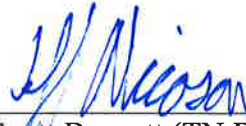
**NOTICE TO THE CHANCERY COURT OF SHELBY COUNTY,
TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS
OF FILING NOTICE OF REMOVAL OF CIVIL ACTION**

COME NOW, Carroll Property Management, LLC and Hediger Enterprises, Inc. (“Defendants”) and respectfully notify the Clerk of the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis that Defendants have filed a NOTICE OF REMOVAL, a copy of which is attached hereto as Exhibit A, removing this action from the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis to the United States District Court for the Western District of Tennessee. Pursuant to 28 U.S.C. § 1446(d), the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis “shall proceed no further unless and until the case is remanded.”

[signatures on following page]

Respectfully submitted this 2nd day of September, 2015.

LEITNER, WILLIAMS, DOOLEY &
NAPOLITAN, PLLC



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Hediger Enterprises, Inc.

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Plaintiff,)

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CARROLL PROPERTY MANAGEMENT,)
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Defendants.)


No. CH-14-1553-3
JURY DEMANDED

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel in this cause by via electronic notification or by placing a true and correct copy of same in the United States mail, postage prepaid, in a properly addressed envelope, or by hand delivering same to each such attorney as follows:

Adam Nahmias, Esquire
Law Offices of Libby & Nahmias
150 Court Avenue
Memphis, Tennessee 38103
adam@lnlawmemphis.com

This the 2nd day of September, 2015.



D. Scott Bennett
Jeffrey E. Nicoson